

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

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KLOOSTERBOER INTERNATIONAL
FORWARDING LLC and ALASKA REEFER
MANAGEMENT LLC,

Plaintiffs,

vs.

UNITED STATES OF AMERICA, U.S.
DEPARTMENT OF HOMELAND SECURITY, U.S.
CUSTOMS AND BORDER PROTECTION, and TROY
A. MILLER, U.S. Customs and Border Protection
Acting Commissioner, in his official capacity,

Defendants.
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Case No.: 3:21-cv-00198-SLG

**DECLARATION OF
PETER D. STRONG**

Pursuant to 28 U.S.C. § 1746, I hereby declare as follows:

1. I am a U.S. citizen and the founder of Coastal Transportation Inc. ("Coastal"), a family-owned ocean transportation company headquartered in Washington State with terminals in Seattle and Dutch Harbor, Alaska.

2. I am currently the president of Coastal.

3. Coastal has been in business since 1984, providing ocean transportation services to and from Seattle and western Alaska.

4. Coastal routinely transports equipment, supplies and other merchandise to towns and communities in western Alaska in support of fishing activities and also routinely transports, among other things, fish and fish products from Alaska to Seattle.

5. Coastal currently owns and operates five vessels registered with the U.S. Coast Guard, referred to as "U.S.-flag" vessels, manned by U.S.-citizen crews. Coastal's vessels are all coastwise qualified and all have coastwise endorsements on their vessel documents, making them

eligible to transport merchandise between two points in the United States. Over the past seven years, Coastal has invested \$50m in infrastructure in order to remain competitive. This included building a new Jones Act compliant ship with all new mechanical and refrigeration systems (replacing 2 older 1960s-era ships), a cold storage in Dutch Harbor and new offices at our Seattle terminal.

6. Coastal is one of four Jones Act carriers serving Dutch Harbor, Alaska with qualified U.S.-flag vessels.

7. Coastal is a strong supporter of the Jones Act and believes that it should be enforced to achieve its intent of reserving U.S. domestic maritime trade for U.S. citizens owning and operating U.S.-flag vessels built in the United States with U.S. citizen crews.

8. Coastal has a strong interest in adequate enforcement of the Jones Act, as evasion of the Jones Act reduces cargoes available to be shipped in compliance with the law and reserved for qualified U.S.-flag vessels, such as the ones Coastal owns and operates.

9. Coastal is harmed when cargoes reserved for qualified U.S.-flag vessels by the Jones Act are diverted to foreign-flag vessels with foreign ownership and non-U.S. citizen crews operating in violation of the Jones Act.

10. Coastal has been harmed over many years by the scheme to ship cargoes on foreign-flag vessels from Alaska to destinations in the United States, which is clearly transportation of merchandise encompassed by the Jones Act via use of a contrived Canadian rail apparatus, abuses of through shipment and storage in a foreign cold storage.

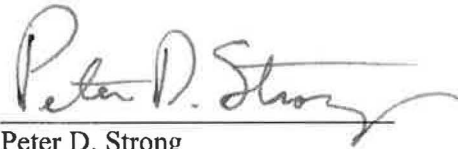
11. Cargoes shipped in violation of the Jones Act from Alaska to the lower 48 states which Coastal and similarly situated carriers should have transported are not recoverable by Coastal and other carriers which have been harmed by the loss of cargo.

12. Coastal believes that there is currently more than adequate service between Alaska and the lower 48 states provided by qualified Jones Act carriers to transport all fish and fish products produced in Alaska.

13. Since Customs and Border Protection apparently delivered penalty notices to certain companies involved in the Alaska fish and fish product trade in August 2021, Coastal's bookings for transportation of fish and fish products have increased substantially.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: September 9, 2021

A handwritten signature in black ink, reading "Peter D. Strong", written over a horizontal line.

Peter D. Strong
President
Coastal Transportation Inc.